

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Eugene Westmoreland,)	
)	
<i>Plaintiff,</i>)	
)	
-vs-)	No. 23-cv-1851
)	
Thomas Dart, Sheriff of Cook)	Judge Tharp Jr.
County, et al.,)	
)	
)	Magistrate Judge Gilbert
<i>Defendants.</i>)	

PLAINTIFF'S INSPECTION REQUEST

Plaintiff, by counsel, and pursuant to Rule 34(a)(2) of the Federal Rules of Civil Procedure requests to enter the Cook County Department of Corrections on or before June 23, 2023 to inspect, measure, survey, and photograph the following:

- a) The two pedestrian tunnels connecting the Residential Treatment Unit (RTU) to the adjacent buildings at the Cook County Department of Corrections. *See* Dkt. 8-2, Printout from Walsh Construction regarding the New RTU-RCDC Facility; and
- b) The ramp(s) in Division 4 of the Cook County Department of Corrections that plaintiff Westmoreland navigated on

February 18, 2023 when he was transported from RTU to
vote. A screenshot of at least one ramp is depicted below:



DIV 4-CAM 1.029 Hallway Classrooms-2023-02-18 12h00min00s000ms

an attorney for plaintiff

Patrick W. Morrissey
Thomas G. Morrissey, Ltd.
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CERTIFICATE OF SERVICE

I, Patrick W. Morrissey, state that on May 30, 2023, I served the foregoing by email to the attorney listed below:

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